

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

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DEAN BEER,

Plaintiff,

v.

MONTGOMERY COUNTY, et al.,

Defendants.

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CIVIL ACTION NO. 20-1486

**DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT  
PURSUANT TO RULES 12(b)(6) and 12(b)(1)**

Defendants Montgomery County, Commissioner Dr. Valerie Arkoosh, Commissioner Kenneth Lawrence, Commissioner Joseph Gale, and Chief Operating Officer Lee Soltysiak (collectively, the "Defendants"), by and through their undersigned counsel, move for dismissal of Plaintiff's Complaint pursuant to Rules 12(b)(6) and 12(b)(1) of the Federal Rules of Civil Procedure and rely on the Memorandum of Law in Support of Defendants' Motion to Dismiss Plaintiff's Complaint Pursuant to Rules 12(b)(6) and 12(b)(1) filed contemporaneously herewith.

Respectfully submitted,

Date: May 21, 2020

/s/ Raymond McGarry

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Commissioner Dr. Valerie Arkoosh, Commissioner  
Kenneth Lawrence, Commissioner Joseph Gale,  
and Chief Operating Officer Lee Soltysiak*

**CERTIFICATE OF SERVICE**

I, Raymond McGarry, hereby certify that on the 21<sup>st</sup> day of May, 2020, I caused a true and correct copy of the foregoing to be electronically filed with the Court using the CM/ECF System and served upon those parties requesting service therefrom. The document is available for viewing and downloading.

/s/ Raymond McGarry  
Raymond McGarry